

AO 91 (Rev. 08/09) Criminal Complaint

FILED *Marshall*

## UNITED STATES DISTRICT COURT

for the

Western District of Texas

2012 JUN 28 AM 9:02

CLERK US DISTRICT COURT  
WESTERN DISTRICT OF TEXAS

United States of America  
v.  
DAGOBERTO LIRA-MORENO  
ZULUE AGUILAR-IBARRA

Case No.

BY

TAM  
DEPUTY

A 12-m-452

*Defendant(s)*

## CRIMINAL COMPLAINT

I, the complainant in this case, state that the following is true to the best of my knowledge and belief.

On or about the date(s) of June 26, 2012 in the county of Travis in the  
Western District of Texas, the defendant(s) violated:

<i>Code Section</i>	<i>Offense Description</i>
USC 21 section 841(a)(1) and 846	Conspiracy to possess and distribute cocaine.

This criminal complaint is based on these facts:

On June 26th, 2012, at approximately 6:00 pm, members of the Austin Police Department's Narcotic Conspiracy Unit, executed a search warrant located at 908 Bird Creek #B, Austin, Texas, Travis County. During the execution of the search warrant, Dagoberto Lira-Moreno and Zulue Aguilar-Ibarra were found to be in possession of cocaine.

☒ Continued on the attached sheet.*Complainant's signature*

REINALDO PARKOR DETECTIVE

*Printed name and title*

Sworn to before me and signed in my presence.

Date:

6-28-2012

City and state:

Austin, Texas

Mark Lane

United States Magistrate Judge

  
*Printed name and title*

## Attachment

The following information is a result of my investigation and information provided to me by other law enforcement sources:

On June 26<sup>th</sup>, 2012, at approximately 6:00 pm, members of the Austin Police Department's Narcotic Conspiracy Unit, executed a search warrant located at 908 Bird Creek #B, Austin, Texas, Travis County. During which time, members of the Narcotic Conspiracy Unit came in contact with subjects inside. While clearing the residence for confederates, Officers observed a Hispanic male running toward the rear of the residence with a plastic baggie in his hand. While running away from officers, the Hispanic male tossed the baggie into the trash can located inside the kitchen. It was later discovered that the plastic baggie which the Hispanic male had in his possession was a white powdery substance.

Subjects inside were identified as **Dagoberto Lira-Moreno** Hispanic male, born 8-23-1976, and **Zulue Aguilar-Ibarra**, Hispanic female, born 2-25-1990. Both subjects were read their Miranda rights. **Zulue Aguilar-Ibarra** told Detective Jesse Prado that she was the girlfriend of **Dagoberto Lira-Moreno**, and that she and **Dagoberto Lira-Moreno** lives at the above address. **Zulue Aguilar-Ibarra** also said her boyfriend **Dagoberto Lira-Moreno** sells drugs. **Zulue Aguilar-Ibarra** also told Detective Prado, that **Dagoberto Lira-Moreno** received a shipment of Cocaine at their residence located at 908 Bird Creek #B on Sunday June 24, 2012.

While searching the residence for contraband and evidence, Detectives found and seized eight (8) vacuum sealed plastic bags and a digital scale with cocaine residue.

Preliminary test of the white powdery substance found in plain view, tested positive for cocaine, and had an approximate weight of 507 grams.

Based on the above information, I believe probable cause exists to believe that **Dagoberto Lira-Moreno** and **Zulue Aguilar-Ibarra** violated Title USC 21 section 841(a)(1) and 846, in Austin, Travis County, Western Judicial District of Texas.

YOUR AFFIANT IS A 16 YEAR POLICE OFFICER, AND HAVE BEEN WORKING NARCOTICS FOR OVER FIVE YEARS. I HAVE KNOWLEDGE AND EXPERIENCE IN WORKING WITH NARCOTICS, AND THE INFORMATION IN THIS REPORT IS THROUGH KNOWLEDGE AND KNOWLEDGE OF OTHER OFFICERS, AND IS TRUE AND CORRECT.